

EXHIBIT 3



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1 **services during high school?**

2 A. Oh, yes.

3 **Q. What were these freelance services?**

4 A. I was a high school sports reporter for a
5 local paper.

6 **Q. Okay. And about what year was that?**

7 A. 1977-ish.

8 **Q. Your first job as a reporter came in 1979;
9 is that correct?**

10 A. Full-time job, yes.

11 **Q. And have you been a reporter since?**

12 A. Mm-hmm.

13 **Q. Have you received any awards for reporting?**

14 A. Many.

15 **Q. Which rewards have you received?**

16 A. I've received -- oh, my gosh. Where do you
17 start?

18 **Q. Start with the earliest.**

19 A. Religion News Writer's Association,
20 multiple, multiple awards, I'd say. I just received
21 several last year, which are -- detail on my blog,
22 which is publicly available. Let's see. Associated
23 Press, Mark Twain Award, Chesapeake. My goodness.
24 Let's see. Wilbur. Where do we start? Three time
25 Wilbur Award winner. Wilbur is for rewards by the

1 Religion Communicators Council. This is a national
2 award for excellent religion reporting, excellence in
3 religion reporting. So I'm a three-time winner there.

4 Let's see. Multiple -- other than the
5 Associated Press and local -- local awards, I'd have
6 to get my resume in front of me to detail ones that
7 are out of the Washington D. C. area. Anyway, how
8 many? I mean, 20, 25. I don't know. I don't have a
9 number right in front of me.

10 **Q. You mentioned that all of the awards are on**
11 **your blog; is that correct?**

12 A. My latest one is on my blog, the Religion
13 News Writers, the three ones, the first and second
14 place awards that I won for the Religion News Writers
15 Association, which is a professional association of
16 the -- all the religion reporters in the country.
17 It's not really known outside of people who -- it's a
18 -- it's a -- how would I put it? It's people who
19 cover religion. Most people outside of the -- of the
20 occupation wouldn't know about it, but it pits the
21 best people in the business against each other. So
22 I'm up against people from the New York Times, the
23 Washington Post, the Atlantic, I mean, you know. And
24 I won for my work for the National Geographic,
25 Politico, and Newsweek.

1 **Q. And the Religion Communicator Council, I**
2 **understood your testimony to be, a professional**
3 **association of religion reporters; is that correct?**

4 A. Well, there's two different groups.
5 There's the Religion News Association. That's a whole
6 different group. Religion Communicators Council is
7 something else. It's a -- that's something different.

8 **Q. Okay. Please explain.**

9 A. I'm not a member of the Religion
10 Communicators Council. I'm a member of the Religion
11 News Association. I know less about the Religion
12 Communicators Council, and I've won many more rewards
13 for the Religion News Association. I did not go into
14 that on my blog because, I mean, that would take much
15 more room. The Wilbur Award is -- it involves more
16 disciplines, more broadcast, and a few more -- it's a
17 bit more wide-ranging than the Religion News
18 Association awards, I believe, but don't quote me on
19 that.

20 **Q. Why did you receive these Wilbur awards?**

21 A. Well, it's for excellence in religion
22 reporting.

23 **Q. Was it a particular piece?**

24 A. Yeah. They were both for pieces on -- one
25 was on clergy. Let's see. One was back in 2002 about

1 the state of America's clergy. Let's see. I think
2 the next one was 2015, about a Lutheran clergy woman.
3 And then there was the 2018 award that I talk about on
4 this blog.

5 **Q. I see also that you've published seven**
6 **books; is that correct?**

7 A. Mm-hmm. Yes, there would be seven. That
8 should be listed on my blog.

9 **Q. The text of the blog states you've**
10 **published seven books, the latest being "Finding Joy:**
11 **A Mongolian Woman's Journey to Christ," the biography**
12 **-- well, a biography. Before that you've published**
13 **"In the house of the Serpent Handler: A Story of**
14 **Faith and Fleeting Fame in the Age of Social Media."**

15 These are two books that you've written; is
16 that correct?

17 A. Mm-hmm.

18 **Q. You've written five other books, I deduced,**
19 **from the text. Were they all about religion?**

20 A. One was not all. One was a collection of
21 Victorian fairy-tales.

22 **Q. Okay. And I see that you have served as a**
23 **visiting journalism professor at the University of**
24 **Alaska at Fairbanks; is that correct?**

25 A. Mm-hmm.

1 **Q. Have you served as professor at any other**
2 **universities?**

3 A. I was at Union University in Jackson,
4 Tennessee.

5 **Q. Any others?**

6 A. I was an adjunct professor for one semester
7 at University of Maryland. Also an adjunct -- oh, my
8 goodness. What's the name of the place? Patrick
9 Henry University in -- oh, my -- it's in Virginia,
10 Purcellville, Virginia. P-U-R-C-E-L-L-V-I-L-L-E,
11 Purcellville, Virginia.

12 **Q. Have you served as professor or teacher of**
13 **journalism anywhere else?**

14 A. No. This is my only -- those are the only
15 four places.

16 **Q. Excellent. For how long did you serve as a**
17 **professor, cumulatively?**

18 A. Let's see. Well, let's see. Well, if you
19 count up, I guess, the adjunct, two and a half years.
20 I guess if you count up the adjunct and the full-time
21 experiences, about two and a half years.

22 **Q. Okay. And in your role as professor, were**
23 **these all journalism professor roles or --**

24 A. Yes.

25 **Q. In the course of your teaching as**

1 **Correct or incorrect?**

2 MS. TESORIERO: Objection to form.

3 A. This pitch was the -- this would have been,
4 really, the beginning of my work on this article.

5 **Q. This pitch was the very beginning of your**
6 **work on this article; correct?**

7 MS. TESORIERO: Objection.

8 A. I would say yes.

9 **Q. That's your testimony?**

10 MS. TESORIERO: Objection.

11 A. Just a moment. It depends on what you call
12 "work."

13 **Q. What was entailed in drafting this pitch?**

14 A. I had gotten -- I had gotten an idea for
15 this article and I drafted the pitch.

16 **Q. Where did the idea come from?**

17 A. I had -- someone suggested it to me.

18 **Q. Who suggested it to you?**

19 A. I had a -- another journalist.

20 **Q. Another journalist suggested it to you?**

21 A. Mm-hmm.

22 **Q. Who was this journalist?**

23 A. His name is Kevin.

24 **Q. What is Kevin's last name?**

25 A. Trying to remember. My mind is blank right

1 now. I can't remember.

2 Q. How did you know Kevin?

3 A. Actually, I really didn't know him.
4 Somehow he had heard of me. I really didn't -- I
5 really hardly knew the man. I mean, I really didn't
6 know him, actually.

7 Q. How did Kevin convey this idea for this
8 article?

9 A. E-mail.

10 Q. Did he write this pitch for you?

11 A. Did he write the pitch?

12 Q. Correct.

13 A. I wrote the pitch. He had some -- some of
14 this is -- some of this is pitch is taken from what he
15 wrote me.

16 Q. When did he write you that? Before or
17 after September 1st, 2021?

18 A. When did he send me that e-mail? Let's
19 see. I'm trying to remember. I know I had gotten an
20 e-mail, and I'm just trying to remember when. Trying
21 to remember when he sent it to me. And I -- I don't
22 remember. I don't remember. I really don't remember
23 when he sent it to me.

24 Q. Did you provide your counsel approximately
25 26 pages of e-mails in the course of preparing for

1 A. I was laid off.

2 Q. And what was the stated reason?

3 A. Finances.

4 Q. Did your layoff have anything to do with
5 this article?

6 A. No.

7 Q. Did your layoff have anything to do with
8 this lawsuit?

9 MS. TESORIERO: Objection. Calls for
10 speculation.

11 A. May I suggest you ask Nancy Cooper that?

12 Q. Pardon?

13 MS. TESORIERO: You can still answer his
14 question.

15 A. I can answer?

16 MS. TESORIERO: Can you restate the
17 question.

18 Q. Did the lawsuit have anything to do with
19 you being laid off?

20 A. No.

21 Q. Do you have any contracts with Newsweek?

22 A. Contracts?

23 Q. Do you have any form of written agreement
24 with Newsweek, for example, a severance agreement?

25 A. I don't believe so.

1 Q. And you said that they laid you off because
2 of finances?

3 A. Yes.

4 Q. Could you please expand?

5 A. That's all I was told.

6 Q. Who told you that?

7 A. It was Dayan.

8 Q. And when did that conversation take place?

9 A. November of 2022.

10 Q. Was it effective immediately or effective
11 at some future date?

12 A. Future date.

13 Q. What was the future date?

14 A. February 2023.

15 Q. So you were paid through February of 2023?

16 A. Trying to remember. Yes.

17 Q. Your last article is dated January 1, 2023.

18 A. Mm-hmm.

19 Q. So you were paid for both January and
20 February of 2023 even though you didn't write any more
21 articles for Newsweek?

22 MS. TESORIERO: Objection to form.

23 A. Yes, sir.

24 Q. Did you perform any services for Newsweek
25 in January or February of 2023?

1 A. I really can't remember.

2 Q. You are trained as a minister, are you not?

3 A. No, I'm not.

4 Q. You undertook some form of religious
5 studies, did you not?

6 A. Yes.

7 Q. What were your religious studies?

8 A. It was a master's degree.

9 Q. It was a master's degree?

10 A. Uh-huh.

11 Q. What is the formal name of the degree?

12 A. Master's degree in religion.

13 Q. And where did you get that degree?

14 A. At Trinity Episcopal school for ministry,
15 but it's not an MDF.

16 Q. What is it if not an MDF?

17 A. It's not -- it's a regular master's degree.
18 It's an academic degree. It's not a ministerial
19 degree.

20 Q. Okay. So this Episcopal school had
21 separate programs for religion and ministerial
22 programs; is that correct?

23 A. Mm-hmm.

24 Q. What is the distinction?

25 A. Well, master's degree in divinity is for

1 explain what you mean by that?

2 Q. Jinx Strange is a pseudonym, is it not?

3 A. His Facebook page says Jinx Strange.

4 Unlike other people I interviewed, he did not say he
5 was using a pseudonym.

6 Q. How did you come to e-mail JInx Strange in
7 the first place?

8 A. I was referred to him.

9 Q. By whom?

10 A. Members of the defendants in the
11 QueerSatanic case.

12 Q. When did they provide you that information?

13 A. Where or when?

14 Q. When.

15 A. After I interviewed them in person.

16 Q. When was that?

17 A. What day did I interview them? Let's see.
18 It was in -- it was in October 2021. What day it was?

19 Q. Early, mid, or late suffices for my
20 purposes.

21 A. We'll say mid October.

22 Q. Okay. On September 30th, you had testified
23 that that was the first instance in which you pitched
24 the subject article. Do you remember that?

25 A. Right.

1 Q. How long after that pitch did you get the
2 green light to start pursuing this article?

3 A. Well, let me think. I'm trying to
4 remember. I can't remember. I don't think it was
5 long after that. However -- I don't think it was long
6 after that.

7 Q. In terms of days? Weeks?

8 A. Probably within a week.

9 Q. And to clarify, that was when you got the
10 green light to pursue the article; correct?

11 A. Sure. However -- yeah, I would say within
12 a week.

13 Q. Okay. And then how long after the green
14 light did you talk to the QueerSatanic?

15 A. Well, I had to find them first. Let's see.
16 It took some -- yeah. I had to find them. Talk them
17 into doing the interview. That took a little while.
18 So that was at least another week.

19 Q. You had to talk them into doing an
20 interview?

21 A. Well, yeah.

22 Q. What did that entail?

23 A. Numerous -- a lot of messaging back and
24 forth.

25 Q. There was a lot of messaging back and

1 **forth?**

2 A. Well, yeah.

3 **Q. How did these messages take place?**

4 A. We messaged -- let's see. Messaged each
5 other on Twitter.

6 **Q. Is that all of the messaging that took**
7 **place --**

8 A. Yes.

9 **Q. -- which constituted talking them into**
10 **doing the interview?**

11 A. Mm-hmm, mm-hmm.

12 **Q. During what time period did you have these**
13 **discussions?**

14 A. It would have been early to mid October, up
15 until the time we met.

16 **Q. Did you interface with personal Twitter**
17 **accounts or the QueerSatanic account?**

18 A. I think QueerSatanic. I believe it was
19 QueerSatanic.

20 **Q. Was it only QueerSatanic, or did you also**
21 **interface with personal accounts?**

22 A. I think it was only QueerSatanic -- I'm
23 trying to remember. I don't remember.

24 **Q. Would it refresh your --**

25 A. I'm trying -- I just cannot. What were you

1 **photos.**

2 A. All right. No. That was -- no, I did not.

3 **Q. Did Jinx Strange ever give you any names of**
4 **individuals who have allegedly been sexually abused by**
5 **anyone in the course of TST services and then covered**
6 **up?**

7 MS. TESORIERO: Objection to form.

8 A. He said he was willing to, but I didn't ask
9 him.

10 **Q. You did not ask him. Why didn't you ask**
11 **him?**

12 A. Because the article was mainly on the
13 lawsuit, and it was not on the -- it was not an
14 investigation into the sexual abuse or the finances or
15 the alt-right figures. It wasn't on these various
16 permutations. The article was on the QueerSatanic
17 people.

18 **Q. Well, I mean, the article was about the**
19 **sexual abuse and cover-up plan, was it not?**

20 MS. TESORIERO: Objection to form.

21 A. No. The article was on the lawsuit.

22 **Q. Then why did you include the statement?**

23 A. I included a lot of statements.

24 **Q. Why didn't you include the subject**
25 **statement for which we are here today?**

1 A. Because it gave a general view of the
2 various controversies surrounding The Satanic Temple.

3 **Q. And you used the phrase -- well, let's --**

4 MR. KEZHAYA: Are we on Exhibit 7 now?

5 THE REPORTER: 8.

6 MR. KEZHAYA: I'm going to mark the subject
7 article as Exhibit 8. Did we already have it in here?
8 I don't think so.

9 Sara, do you already have a copy of the
10 article?

11 MS. TESORIERO: Oh, a copy? Yes, I'm
12 sorry. I didn't know that was going to be an exhibit.
13 I have a copy of the article. Is that Exhibit 8? Do
14 you need it?

15 MR. KEZHAYA: No. I don't need it.

16 (Exhibit No. 8 was marked for
17 identification.)

18 **Q. Please review Exhibit 8.**

19 A. Yes.

20 **Q. Would you agree with me that that is a true**
21 **and correct copy of the article that you wrote?**

22 A. As far as I can tell.

23 **Q. At the top of page 8, you state [as read],**
24 **"He wrote, 'Accounts of sexual abuse being held up in**
25 **ways that were more than anecdotal.'" And that's the**

1 extent that I care about.

2 Do you see that?

3 A. Yes, I do.

4 Q. Why did you include that statement?

5 A. It was part of a paragraph. It was part of
6 a paragraph that had several statements in it.

7 Q. There were many paragraphs that had many
8 statements in it by Jinx Strange. Why --

9 A. Yes.

10 Q. -- did you include this particular
11 statement?

12 A. Yes. He gave me a very long e-mail.

13 Q. Yes, he did. And you went through that
14 e-mail, presumably, did you not?

15 A. That's right.

16 Q. And you found a choice selection from it;
17 correct?

18 A. I selected several sentences and paragraphs
19 from it.

20 Q. And why did you select those to the
21 exclusion of others?

22 A. Well, Jinx had a lot of -- several of these
23 paragraphs -- all right. I have to explain a little
24 bit about reporting. A lot of things here, he had
25 references to many things that you would have to have

1 additional explanations of who these people were and
2 backgrounders. And there was way too much background
3 that you would have to explain what he was talking
4 about on various people, various personalities. And I
5 was looking for more of -- paragraphs that explain
6 more of a general feel of what -- his perception of
7 what The Satanic Temple was about. What he thought,
8 what his experience was, what he was hearing from
9 other people. What I picked out was the best
10 sentences that he had that expressed his point of
11 view.

12 **Q. Okay. And earlier you testified that this**
13 **article was about the lawsuit; correct?**

14 A. Yes. It was about the lawsuit. And --
15 yes, it was.

16 **Q. Was that the only thing that this article**
17 **was about?**

18 A. Well, obviously, also an explanation of the
19 Satanic -- parts of The Satanic Temple.

20 **Q. Parts of the Satanic. Please be more**
21 **particular. What parts?**

22 A. Let me explain to you. Just a moment.
23 I'll get to it in just a moment. Okay. When Johnson
24 talks on page 7, he talks about TST's background. So
25 I'm thinking, okay, background, and then I have -- you

1 know, is TST a religion? Can you criticize it?

2 That's in the middle. I quote "you" talking about the
3 defendants. Then quote Johnson talking about the
4 background. And so, okay, so what are people saying
5 about The Satanic Temple. So, okay, what are people
6 saying.

7 So then I start asking other people, okay,
8 what are people saying. I talked to the unofficial
9 biographer, Mr. Laycock. Talked to him. Talked to
10 Mr. Strange. Talked to Ms. DeMeur. Talked to Scott
11 Malphas. These are the other two -- you know, we have
12 -- are not their true names, I know that. Talked to
13 you. Of course talked to Lucien. And by that time it
14 was -- the article is running long enough.

15 So I wanted to kind of give a general
16 picture of what was more of a -- I wanted to give more
17 of a background of what was going on with The Satanic
18 Temple. Kind of how it started. The whole
19 mocumentary. So I had to throw in a bit more details
20 about The Satanic Temple other than the lawsuit. So
21 does that answer your question?

22 **Q. How did you ascertain who you would talk to**
23 **and what degree of fact checking you were going to get**
24 **into?**

25 MS. TESORIERO: Objection to form.

1 A. Well, I believe it was Lucien who asked me
2 to talk to Mr. Laycock, although I had heard of Mr.
3 Laycock. Obviously, you were the attorney, and
4 Lucien. Spent many hours talking about the view.
5 Well, I spent some time talking -- I had several
6 interactions with you, and a long interview with
7 Mr. Greaves. And a fairly decent interview with
8 Mr. Laycock. The Seattle -- talking person, the
9 Seattle defendants, three out of the four. The --
10 let's see. Excuse me. Okay. And -- yeah. And then
11 e-mailed two other people. Oh, sorry. Three other
12 people.

13 And then the second half of your question
14 was what?

15 **Q. How did you ascertain to what degree of**
16 **fact checking you were going to engage in?**

17 A. What degree of -- well, I mean, what degree
18 of fact checking? I'm not sure what you mean by that.
19 Can you explain?

20 **Q. Do you have a definition in your mind of**
21 **what fact checking entails?**

22 A. I know what fact checking entails.

23 **Q. Please provide me your understanding of the**
24 **definition of --**

25 A. Well --

1 Q. Let's phrase the question --

2 A. Yeah. Let's phrase the question a
3 different way.

4 Q. Do you know of anyone at Newsweek who
5 performed any fact investigation into this paragraph?

6 A. No. I don't know of anyone who performed a
7 fact investigation into this paragraph.

8 Q. Other than you, did anyone at Newsweek have
9 any contact with Scott Malphas?

10 MS. TESORIERO: Objection to form.

11 A. No.

12 Q. You hesitate with "No." Is there someone
13 else that you know of who has had --

14 A. No. No. There is no one else.

15 Q. Okay. And likewise, for the allegation in
16 the Jinx Strange e-mail quoted in the article that
17 there are accounts of sexual abuse being covered up,
18 you personally did not investigate that at all;
19 correct?

20 MS. TESORIERO: Objection to form.

21 A. Did I personally investigate it?

22 Q. Correct.

23 A. I found what he said inherently plausible
24 considering the account from the Seattle quartet, or
25 the interviews with the Seattle people that -- and the

1 testimony -- well, not testimony -- the account from
2 Scott that there was of these -- the reason for the
3 sex-positive guidelines -- that what Jinx was saying
4 was true.

5 Q. You found it inherently plausible. What
6 did you do to foreclose the possibility that he was
7 lying?

8 MS. TESORIERO: Objection to form.

9 A. Why would he lie?

10 Q. What did you do to foreclose the
11 possibility that he was lying?

12 MS. TESORIERO: Objection to form.

13 A. What did I do to foreclose?

14 Q. Stated another --

15 A. If someone is lying, you know, like, if you
16 think they're lying, for instance, like, their links
17 don't check out. They don't exist. First of all, you
18 check to make sure that they're a real person. I
19 mean, everything checked out. His -- what he's -- I
20 mean, I knew, for instance, what he was -- like, the
21 sentence before that there was some connections to the
22 alt-right or figures. I certainly had heard many
23 complaints about that, even before the pictures showed
24 up after the article, which I did not go into for the
25 article.

1 In terms of there were -- I knew there were
2 complaints about finances. Even Doug Laycock -- we're
3 talking about the sentence afterwards. Doug Laycock
4 went into that for his book. So, you know, Jinx had
5 given kind of a general -- it was a general read of
6 The Satanic Temple. And it was his -- it was how he
7 saw the state of the religion. And from my other
8 interviews with people, I found it plausible he was
9 correct.

10 Q. Did you ask Lucien Greaves about coerced
11 sexual activity and cover-up within The Satanic
12 Temple?

13 A. I asked him -- I certainly asked him in
14 connection with the orgies, yes.

15 Q. Not in connection with the orgies. Did you
16 ask him specifically about Jinx Strange's comment?

17 A. No. I did not ask him about Jinx Strange's
18 comment.

19 Q. Why not?

20 A. Why not? I didn't -- I felt I had asked
21 Lucien plenty of questions. And right below that, I
22 had a quote from Lucien that basically denied all
23 these accusations.

24 Q. Did you confront Lucien Greaves with the
25 allegation that there are accounts of sexual abuse and

1 cover-up within The Satanic Temple?

2 MS. TESORIERO: Objection. Asked and
3 answered.

4 A. Did I confront him? Did I confront him?
5 Trying to remember. I don't believe I did.

6 Q. So Lucien Greaves's comment in his e-mails
7 could not possibly have related to something that you
8 did not confront him with. You would agree with me
9 there; correct?

10 MS. TESORIERO: Objection to form.

11 A. I disagree.

12 Q. You disagree?

13 A. I disagree.

14 Q. Please explain your basis for disagreeing.

15 A. His quote here -- his quote underneath, it
16 covered the -- all of Jinx's accusations. He says,
17 "We are accused of all sorts of nefarious things." I
18 covered it. I covered what Jinx was saying.

19 Q. Did you ever even mention the word Jinx
20 Strange -- the name "Jinx Strange" to Lucien Greaves?

21 A. I believe I talked to -- I may have talked
22 to Jinx maybe after I talked to Lucien.

23 Q. So you didn't even talk to Jinx Strange and
24 then talk to Lucien, and yet you're telling me that
25 Lucien's comment pertains to Jinx Strange's

1 **allegations, under oath?**

2 MS. TESORIERO: Objection to form.

3 A. I don't know.

4 **Q. You don't know?**

5 A. I don't know.

6 **Q. You don't know what your testimony is?**

7 A. I know what my testimony is.

8 **Q. Please restate your testimony.**

9 MS. TESORIERO: What testimony are you
10 asking her to restate?

11 MR. KEZHAYA: The subject testimony that
12 we're talking about.

13 MS. TESORIERO: You've asked her several
14 questions. Could you please just clarify for her what
15 you're asking her to restate, or generally.

16 **Q. Your testimony is that after you talked to**
17 **Lucien Greaves you talked to Jinx Strange, and Lucien**
18 **Greaves's commentary pertains to Jinx Strange?**

19 A. I think -- actually, I think Lucien
20 Greaves's commentary pertains to Jinx Strange's
21 accusations.

22 **Q. Based on what?**

23 A. Because -- what do you mean "based on
24 what"?

25 **Q. Well, seeing as how you didn't mention Jinx**

1 Strange or the allegations to Lucien Greaves, I find
2 it very difficult to understand how Lucien Greaves's
3 comment could have any pertinence to Jinx Strange's
4 allegations.

5 A. I don't see how --

6 THE REPORTER: Please. I need to hear the
7 end of the question.

8 MR. KEZHAYA: Jinx Strange or Jinx
9 Strange's allegation.

10 MS. TESORIERO: Are you asking her a
11 question?

12 MR. KEZHAYA: I'm asking her to explain
13 what she's -- where she's coming from with her
14 testimony.

15 MS. TESORIERO: Objection. Asked and
16 answered.

17 A. The way -- the way I constructed the
18 article is that the -- okay. Jinx gave -- Jinx had
19 several things to say about the organization, the
20 alt-right, the sexual abuse, the finances. And I had
21 Lucien giving a general denial about -- a general
22 denial. I did not feel he -- Lucien's general
23 statement had to address every single thing
24 specifically.

25 Q. Why did you have him address anything in

1 particular then?

2 MS. TESORIERO: Objection to form.

3 A. Why did I have Lucien address anything in
4 particular?

5 Q. Why did you ask Lucien any particular
6 questions if you felt like a general denial of any
7 nefarious act is adequate for purposes of creating a
8 fair, balanced article?

9 A. I asked Lucien direct questions on other
10 matters. I mean, he'd direct the answers to many
11 other questions, which he gave -- he had more than
12 enough -- I gave him more than enough space in the
13 article to give plenty of answers to my questions.
14 And he gave a fair defense of many things, for
15 instance -- and, again, more the whole orgies matter.
16 So I felt the paragraph was a defense of the -- that
17 matched the Jinx quote. And I was -- that it was a
18 fair rebuttal.

19 Q. Even though you never talked to Lucien
20 Greaves after Jinx Strange; correct?

21 A. Yes. I did feel it, yeah.

22 Q. And you constructed the article to make it
23 appear that way; correct?

24 MS. TESORIERO: Objection. Form. Appear
25 what way?

1 A. Appear?

2 Q. You testified earlier: I constructed the
3 article to make it appear as if Lucien Greaves said --

4 A. No.

5 Q. -- generally denied everything that --
6 (Cross talk.)

7 MS. TESORIERO: Objection.
8 Mischaracterizes her testimony.

9 A. That's a lie.

10 Q. Oh. So then --

11 A. That's not true.

12 Q. -- you don't consider that general denial
13 to be applicable to Jinx Strange's testimony.

14 A. It's applicable but --

15 MS. TESORIERO: Wait. Let him finish his
16 question.

17 A. Okay. You're putting words in my mouth
18 that aren't true. Okay. You can -- I'm trying to
19 think of how to word this. Wait a minute.

20 In the newspaper article -- I feel I have
21 to explain how one puts together newspaper articles.
22 Okay. You can have a person's quotes. You can have
23 another person's quotes underneath them. They don't
24 have to necessarily be, you know, like, directly --
25 like, you talked to person A, and then you directly

1 talked to person B right afterwards. You can have --
2 you know, you can have them from separate
3 conversations at different times. So if I have a
4 quote from Lucien that applies to various accusations
5 that people make to The Satanic Temple, I have the
6 right to put that in under a Jinx quote no matter when
7 Lucien said it.

8 **Q. Would you agree with me that the accusation**
9 **that TST engages in sexual abuse and cover-up is**
10 **serious?**

11 MS. TESORIERO: Objection to form.

12 A. Well, sure. That's what kind of got the
13 Seattle people in trouble; right?

14 **Q. Would you agree with me that writing an**
15 **article that states TST engages in sexual abuse and**
16 **cover-up is a criminal allegation?**

17 MS. TESORIERO: Objection to form. That
18 misrepresents the article and calls for a legal
19 conclusion.

20 A. Okay. Can you please restate that.

21 **Q. Is sex abuse a crime?**

22 A. I believe so.

23 **Q. Is covering up sex abuse also a crime?**

24 MS. TESORIERO: Objection. Form. She's
25 not a lawyer.

1 **Q. And that's not a rhetorical accusation.**
2 **You are, in fact, accusing TST of sexual abuse and**
3 **cover-up?**

4 MS. TESORIERO: Objection. Form.

5 A. I'm being put into a corner. I'm getting
6 --

7 **Q. It's a yes/no question, Julia.**

8 A. It doesn't sound like it to me.

9 **Q. You can say "yes, because," or "no,**
10 **because," if it makes you feel better.**

11 A. You're asking me if I'm -- if I'm accusing
12 TST. Wait a minute. I am quoting someone. I'm
13 quoting someone.

14 **Q. And yet --**

15 A. You're asking me if I'm accusing them. I'm
16 not accusing anybody of anything.

17 **Q. You found it inherently plausible, you**
18 **testified earlier?**

19 A. I ran the quote because -- I wouldn't run
20 -- I wouldn't run a quote if someone said the sky was,
21 you know, orange or something.

22 **Q. Why not?**

23 A. I mean, I found the -- the witness was
24 inherently plausible. I will -- but it was a claim.
25 So -- but I personally am not accusing TST of

1 anything.

2 Q. It was a claim that you found inherently
3 plausible and you uncritically published it in a
4 publication that more than one in five Americans read;
5 correct?

6 MS. TESORIERO: Objection to form. There's
7 like five questions in there.

8 Q. Did you critically publish it?

9 MS. TESORIERO: Objection to form.

10 Q. Did you analyze whatever sexual abuse is
11 and whatever cover-up is? Did you ask for
12 particulars?

13 MS. TESORIERO: Objection to form.

14 A. I'm going to stay with what I originally
15 said. I'm going to stick with that.

16 Q. I don't care what you're sticking with.
17 Did you or did you not ask for any particulars about
18 what sexual abuse is?

19 A. I did not ask -- did I ask him?

20 Q. Did you ask anyone?

21 A. What do you mean did I ask anyone?

22 Q. Did you ask anyone what particular sexual

23 --

24 A. I think the best way --

25 MS. TESORIERO: Let him finish his

1 A. You're asking a non-techy here.

2 Q. That's okay. I think we have enough
3 information that if I ask you for your calendar, will
4 you know what I'm talking about?

5 A. Yeah, yeah, yeah, yeah. I mean, it's -- it
6 comes with every Mac, you know.

7 Q. And it's called an iMac calendar?

8 A. ICalendar. Small I, capital C, calendar.

9 MR. KEZHAYA: All right. Is November the
10 next month after October?

11 MS. TESORIERO: I think so.

12 Q. Did you ever read Laycock's book?

13 A. I read part -- I didn't get through the
14 whole thing, but I did read part of it. And as much
15 -- anyway, I read part of it.

16 Q. Earlier you mentioned that there was a
17 particular date that was misstated in the book.

18 A. Yes.

19 Q. Do you remember that? What was the date
20 stated? What was the event -- well, let's start with
21 that. What was the date stated in the book?

22 A. Wait a minute. If I can find -- I guess it
23 was -- okay, because he stated -- okay. All right
24 (inaudible). Okay. Because it showed up in the
25 article. Just a moment. I'm looking, I'm looking,

1 even names or contact information who theoretically
2 could be followed up with?

3 A. No.

4 Q. You have been a journalist for 45 years;
5 correct?

6 A. Yes.

7 Q. You have been a professor of journalism for
8 approximately two and a half years; correct?

9 A. Mm-hmm.

10 Q. Do you consider yourself a serious
11 journalist?

12 MS. TESORIERO: Objection to form.

13 A. Yes, I do.

14 Q. Did you consider this piece of work to be a
15 credible, serious, and fair statement about sexual
16 abuse and cover-up?

17 A. My article was fair, yes.

18 Q. I'm asking you about the statement.

19 A. About your statement?

20 Q. Your statement. The one that you put in
21 the article.

22 A. Yes, I did. It was fair. And, yes, if I
23 hadn't believed that there wasn't sexual abuse going
24 on, I would not have put that into the article.

25 Q. And what was your basis to believe there

1 **was actually --**

2 A. Because there were plenty of people who
3 were saying it.

4 MS. TESORIERO: Let him finish.

5 **Q. Let me finish. There were plenty of people**
6 **who say it, but all of these were biased and**
7 **disgruntled former members.**

8 MS. TESORIERO: Objection to form.

9 **Q. Correct?**

10 MS. TESORIERO: Objection to form.

11 **Q. Correct?**

12 MS. TESORIERO: Objection to form.

13 MR. KEZHAYA: I hear your objection.

14 **Q. Correct?**

15 A. Not correct.

16 **Q. Not correct. They were not biased?**

17 A. No. They were not biased.

18 **Q. Which one of them was not biased?**

19 A. Scott wasn't biased.

20 **Q. He wasn't?**

21 A. No.

22 **Q. How do you know he wasn't biased?**

23 MS. TESORIERO: Objection to form.

24 A. Because he was a true believer when he came
25 in, and so was Jinx. And they were all true

1 believers, and they saw stuff they didn't like, and
2 they left. They all -- they all wanted to believe.
3 They all came in, and they believed in the
4 organization, and they left not believing in it.
5 Let's put it that way.

6 Q. Did you talk to them while they were
7 members of the organization?

8 A. I didn't have that opportunity.

9 Q. Did you talk to them after they left the
10 organization?

11 A. Of course.

12 Q. Did you describe all of them as disgruntled
13 former members?

14 A. No.

15 Q. You have never described these sources as
16 disgruntled former members. That's your testimony
17 today; correct?

18 A. I described them as former members.

19 Q. You never described them as disgruntled;
20 correct?

21 MS. TESORIERO: Objection to form.

22 A. No. I did not describe them as
23 disgruntled.

24 MR. KEZHAYA: Could you please get the
25 October 25th pitch? It would've been in Cooper's

1 going to eventually have to answer the question.

2 MS. KEZHAYA: Well, we can move on from
3 that.

4 MR. KEZHAYA: Moving on. Withdrawn.

5 Q. Julia, you've been a professor of religious
6 journalism; correct?

7 A. Journalism. A journalism professor, not
8 just religion. Not just a -- I've taught general
9 journalism and religion reporting.

10 Q. Okay. You've been serving as a journalist
11 for 45 years; correct?

12 A. Right.

13 Q. You don't know your own ethical
14 obligations?

15 MS. TESORIERO: Objection to form.

16 A. Of course I know my own ethical
17 obligations.

18 Q. Do your ethical obligations include a
19 requirement that you convey both sides of a serious
20 allegation?

21 MS. TESORIERO: Objection to form, but
22 answer.

23 THE WITNESS: Right.

24 A. I -- yes, of course.

25 Q. Would you have felt comfortable publishing

1 sexual abuse and cover-up. Sounds great. I'm going
2 to take it at face value."

3 MS. TESORIERO: That is misrepresenting the
4 testimony. She has testified as to what she did to
5 look into those allegations. She just testified that
6 several people reported the same statements to her.
7 If you want to ask about this allegation, ask about
8 it, but the criminal question she has already
9 answered.

10 Q. What delineates the difference between
11 hearing the rumor "TST kills children" versus hearing
12 the rumor "TST engages in sexual abuse and cover-up,"
13 such that you would ask for explanatory details about
14 the former but not the latter?

15 A. Well, there's already been people talking
16 about TST having multiple instances of sexual abuse,
17 harassment. I mean, it's with a -- I mean, this has
18 been -- okay. There's been multi -- once again, as
19 I'm saying for the third or fourth time now, there
20 have been multiple reports among disgruntled, if you
21 like the word, former members, of sexual
22 abuse/harassment slash by -- whether it's from Scott
23 or from the Seattle members or from Jinx.

24 In fact, wasn't there something from Jex
25 Blackmore about -- I'm trying to remember some other

1 public things that have been said. You know, there's
2 been things said about sexual -- anyway, there's been
3 talk of this being a part of some of the culture at
4 the TST. So, with multiple people, and talking about
5 sexual harassment, a sexual harassment complaint being
6 covered up.

7 And, wait, there's one more thing I'm going
8 to add. Excuse me. My mind went off. Give me a
9 moment. I'm sorry. I was going to add something, and
10 it just went out the door. I want to go back to what
11 I did ask -- you -- you've asked -- okay. The culture
12 of -- okay. I'll leave it there. I'll stop there.

13 **Q. You did not answer the question.**

14 **A. I did answer the question.**

15 **Q. The question posed is if you had heard the**
16 **same sources say that TST kills children, why would**
17 **you ask for explanatory details about that but not any**
18 **explanatory details about this sexual abuse and**
19 **cover-up claim?**

20 **A. Do I have to answer a hypothetical?**

21 **Q. Yes.**

22 MS. TESORIERO: Objection. Calls for
23 speculation, but yes, you can give an answer.

24 **A. Yeah. Because you're losing me. Just a**
25 **moment. Okay. If I would ask about details on why --**